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March 3, 2015

Attention: Nancy Rumrill
U.S. Environmental Protection Agency, Region 9
Drinking Water Protection Section, Mail Code WTR-3-2
75 Hawthorne Street
San Francisco, CA 94105

Re: Draft Class III Underground Injection Control Area Permit for Florence Copper, Inc

Dear Ms. Rumrill:

This letter of comment is being submitted regarding the proposed issuance of the EPA Underground Injection Control (UIC) Class III Permit to Florence Copper, Inc.

I understand that the permit, if issued, will allow Florence Copper, Inc. to construct and operate an in-situ copper recovery facility in the Town of Florence. The proposed permit would authorize Florence Copper, Inc. to operate a Production Test Facility (PTF) on approximately two acres for a period of up to two years, followed by post-closure monitoring of up to five years following closure operations.

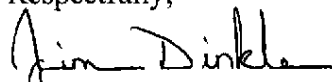
From a fiscal perspective, there is little doubt that should Florence Copper, Inc. begin full-scale operations, the project would provide much needed employment to the local communities as well as a positive economic benefit to the town, county and state. The anticipated employment impact is 240 direct and indirect jobs on-site, 480 jobs in Pinal County and nearly 800 jobs in Arizona. These head-of-household wage jobs, provided by the mining industry are particularly important to rural Arizona. The projected fiscal benefit of \$68.4 million dollars in revenue to the Town of Florence, \$2.1 billion in economic activity for Pinal County and \$3.4 billion in economic activity for the State of Arizona, would provide much needed revenue.

Most importantly, given the concerns raised by local community leaders and residents about adverse effects on the local water supply, this test facility provides an ideal opportunity for Florence Copper, Inc. to prove to the local community as well as the State of Arizona, that they will operate safely and without causing any adverse effects on the local drinking water supplies.

The Town of Florence and their residents deserve to know definitively whether or not this project will be operated safely and pose no risk to their drinking water. This small-scale PTF allows this to be determined before a full-scale facility is approved.

For these reasons, I support the issuance of the EPA Underground Injection Control Class III Permit to Florence Copper, Inc.. Please feel free to contact me if you have any questions.

Respectfully,



Jim Dinkle
Executive Director